IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CLARK R. HUFFMAN, : BRANDI K. WINTERS, : PATRICIA L. GRANTHAM, :

and LINDA M. PACE, : individually and on behalf of :

all others similarly situated,

Plaintiffs,

v. Civil Action No. 2:10-CV-05135-JFL

THE PRUDENTIAL INSURANCE : COMPANY OF AMERICA, :

:

Defendant. :

PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to Fed. R. Civ. P. 23(e)(2), Plaintiffs Clark Huffman, Patricia Grantham, Linda Pace, and Brandi Winters, by and through their undersigned counsel, hereby seek final approval of the class action settlement that was preliminarily approved by this Court on November 21, 2018. ECF No. 191. Since that time, notice has been sent to the Class in the manner prescribed by the Court and no member of the Class has objected to the proposed settlement. The Settlement Agreement provides for the creation of a Settlement Fund in the amount of \$9 million that will be distributed to Class Members pursuant to a formula after deducting attorney's fees, expenses, and incentive awards. The amount of the proposed settlement represents approximately ninety-five percent (95%) of the potential class-wide damages and is an excellent result for the Class that is more than fair, reasonable, and adequate.

For these reasons and for those set forth in the accompanying Memorandum, final approval of the settlement should be granted.

Respectfully submitted,

/s/ Cary L. Flitter

Cary L. Flitter
Andrew M. Milz
Flitter Milz, P.C.
450 N. Narberth Avenue
Narberth, PA 19072
(610) 822-0782 tel
(610) 667-0552 fax
cflitter@consumerslaw.com
amilz@consumerslaw.com

John C. Bell, Jr.
Admitted *Pro Hac Vice*Lee W. Brigham
Admitted *Pro Hac Vice*Bell & Brigham
Post Office Box 1547
Augusta, Georgia 30903-1547
(706) 722-2014 tel
(706) 722-7552 fax
john@bellbrigham.com
lee@bellbrigham.com

M. Scott Barrett
Admitted *Pro Hac Vice*Barrett Wylie LLC
520 North Walnut Street (47404)
P.O. Box 5233
Bloomington, IN 47407-5233
(812) 334-2600 tel
(812) 337-8850 fax
scott@barrettwylie.com

Stuart T. Rossman (BBO #430640) Admitted *Pro Hac Vice* The National Consumer Law Center 7 Winthrop Square, 4th Floor Boston, MA 02110 (617) 542-8010 tel (617) 542-8028 fax srossman@nclc.org

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of the foregoing **Plaintiffs' Motion for Final Approval of the Settlement** to be served upon all counsel of record on March 19, 2019 via electronic mail and via the Court's electronic filing system which will cause an electronic copy of the document to be delivered to all counsel of record.

/s/ Cary L. Flitter

Cary L. Flitter Flitter Milz, P.C. 450 N. Narberth Avenue Narberth, Pennsylvania 19072 (610) 822-0782 tel (610) 667-0552 fax cflitter@consumerslaw.com

COUNSEL FOR PLAINTIFFS